

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

BRITTNEY RUDLER,)	
)	
Plaintiff,)	
)	
v.)	Cause No.: 19-cv-2170 (LDH) (LB)
)	
MLA LAW OFFICES, LTD., et. al.,)	
Defendants.)	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
INFORMATION SUBPOENA QUESTIONS**

NOW COMES the Defendant MLA Law Offices, Ltd. and Defendant John L. Malevitis, Esq. and for their response to Plaintiff's Information Subpoena Questions, here states as follows:

1. Do you have a record of any account in which either judgment debtor may have an interest, whether under the name of the debtor, under a trade or corporate name, or in association with others, as of the date of the subpoena or within 1 year prior thereto?

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: No.

2. As to each to each such account. what is the exact title of the account, the date opened, amounts presently on deposit; if closed, the amount on deposit when closed and the date closed?

<u>TITLE</u>	<u>DATE OPENED</u>	<u>AMOUNT ON DEPOSIT</u>	<u>DATE CLOSED</u>
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ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: N/A.

3. For all bank accounts associated with either judgment debtor, list the name of the bank, the bank's address, and the name in which the account is held.

<u>NAME</u>	<u>ADDRESS</u>	<u>NAME ON ACCOUNT</u>
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ANSWER: For John L. Malevitis: Objection. This request if made in violation of CVP R5224 Without waiving the objection, the response for John L. Malevitis is: N/A; and for MLA Law Offices, Ltd: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: BMO Harris Bank, 120 West Hinsdale Avenue, Hinsdale, Illinois 60521; name of MLA Law Offices, Ltd.

4. Do you have a record of any safe deposit box in which the judgment debtor may have an interest, whether under the name of the debtor under a trade or corporate name, or in association with others, as of the date of the subpoena or within 1 year prior thereto? If so, describe those boxes.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: MLA Law Offices, Ltd. has a safe deposit box at BMO Harris Bank as referenced herein; and for John L. Malevitis, none.

5. List all physical property and/or assets of either judgment debtor and their location. For each, state the name in which such is held, the name of any bank holding a correlated interest, and the address under which it is registered. If any asset is subject to a lien, state the name and address of the lienholder and the amount due on the lien.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response for both John L. Malevitis and MLA Law Offices, Ltd. are: None.

6. Does either judgment debtor own any real estate? If so, list it and describe it by address, value, and description of its current use.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: No.

7. List all motor vehicles owned by either judgment debtor, stating the following for each vehicle: (a) Make, model and year; (b) License plate number; (c) Vehicle identification number; (d) If there is a lien on the vehicle, the name and address of the lienholder and the amount due on the lien.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response for John L. Malevitis and MLA Law Offices, Ltd. are: None.

8. List all accounts receivable due to either judgment debtor, stating the name, address and amount due on each receivable.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response for both John L. Malevitis and MLA Law Offices, Ltd. are: None.

9. Set forth all other judgments that you are aware of that have been entered against either judgment debtor and include the following: (a) Creditor's Name; (b) Creditor's Attorney; (c) Amount Due; (d) Name of Court; (e) Docket Number

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response for MLA Law Offices, Ltd. is none; and for John L. Malevitis, the response is: Judgment entered against John L. Malevitis in the case known as: In Re the Marriage of: Malevitis, Case number 2009 D 8591 in the Circuit Court of Illinois, Domestic Relations Division; Pam Malevitis, creditor; Sandra Burns Law Offices, creditor's attorney; amount due allegedly in excess of \$200,000.00, although not agreed to and in dispute.

10. For all litigation in which either judgment debtor is presently involved, state: (a) Date litigation commenced; (b) Name of party who started the litigation; (c) Nature of the action; (d) Names of all parties and the names, addresses and telephone numbers of their attorneys; (e) Trial date; (f) Status of case; (g) Name of the court and docket number.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: a). 2009; b). Pamela Malevitis; c). divorce proceeding; d). Sandra Burns, River Forest, Illinois; e). N/A; f). ongoing in Court; and g). Circuit Court of Cook County, Illinois, Domestic Relations Division, 2009 D 8591.

11. List all insurance policies held by either judgment debtor.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response for MLA Law Offices, Ltd. is none; and the response for John L. Malevitis is: A life insurance policy for John L. Malevitis is currently held with Pacific Life Insurance Company.

12. What is John L. Malevitis' social security number and last place of employment?

ANSWER: Objection. This request is made in violation of CVP R5224. Without waiving the objection, the response is: last 4 digits 6133; and current place of employment is Paladin Law, Ltd.

13. What is MLA Law Office's LTD EIN?

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: last 4 digits 2145.

14. State each entity affiliated with MLA Law Offices' and corresponding address for accepting service of process.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: None; and current address of the registered agent for MLA Law Offices, Ltd. is 109 Symonds Drive, Unit 156, Hinsdale, Illinois 60522

15. Set forth in detail the name, address and telephone number of all businesses in which the principals of MLA Law Offices now have an interest and set forth the nature of the interest.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: None.

16. Set forth in detail the name, address and telephone number of all businesses in which the principals of MLA Law Offices. now have an interest and set forth the nature of the interest.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: None.

17. For any transfer of business assets that has occurred within six months from the date of this subpoena, specifically identify: (a) The nature of the asset; (b) The date of transfer; (c) Name and address of the person to whom the asset was transferred; (d) The consideration paid for the asset and the form in which it was paid (check, cash, etc.); (e) Explain in detail what happened to the consideration paid for the asset.

ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: None.

18. If MLA Law Offices is alleged to be no longer active, set forth: (a) The date of cessation; (b) All assets as of the date of cessation; (c) The present location of those assets; (d) If the assets were sold or transferred, set forth: (1) The nature of the assets; (2) Date of transfer; (3) Name and address of the person to whom the assets were transferred; (4) The consideration paid for the assets and the form in which it was paid; (5) Explain in detail what happened to the consideration paid for the assets.

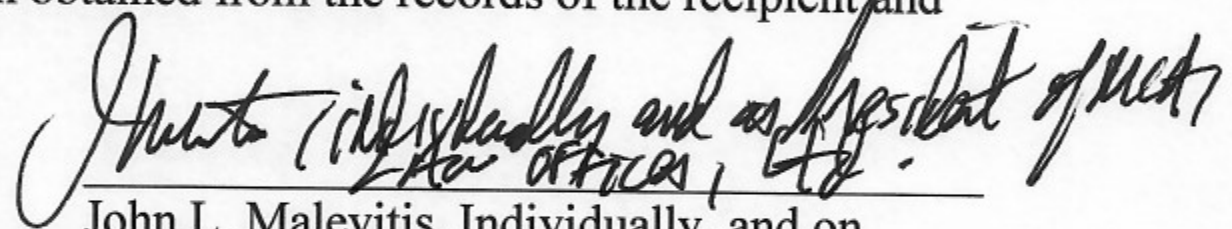
ANSWER: Objection. This request if made in violation of CVP R5224. Without waiving the objection, the response is: N/A, as MLA Law Offices, Ltd. is currently active and in good standing with the Illinois Secretary of State.

19. State the name, address and position of the person answering these questions.

ANSWER: John L. Malevitis, Esq., 109 Symonds Drive, Unit 156, Hinsdale, Illinois 60522; and
President of MLA Law Offices, Ltd.

STATE OF ILLINOIS)
)
COUNTY OF DUPAGE)

John L. Malevitis, individually and as President of MLA Law Offices, Ltd. being duly sworn, deposes and says, that the deponent is the recipient of an information subpoena herein. The answers set forth are made from information obtained from the records of the recipient and personal knowledge.

Handwritten signature of John L. Malevitis, individually and as President of MLA Law Offices, Ltd.

John L. Malevitis, Individually, and on
behalf of MLA Law Offices, Ltd. as its
President

DATED 2/14/22